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8 T-MOBILE USA, INC.

9  
10 UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA  
11

12 STEPHEN PEOPLES,  
13 Plaintiff,

14 v.

15 T-MOBILE USA INC.; DOES I-X and, ROE  
16 Business Entities I-X,  
17 Defendant.

Case No. 2:22-cv-01544-JAD-DJA

**STIPULATION AND PROPOSED  
ORDER TO EXTEND DISPOSITIVE  
MOTION DEADLINE  
(FIRST REQUEST)**

18 Plaintiff STEPHEN PEOPLES (“Plaintiff”), and Defendant T-MOBILE USA, INC.  
19 (“Defendant”), by and through their counsel, stipulate to extend the briefing schedule for  
20 dispositive motions as follows: The parties stipulate that the deadline to file motions for summary  
21 judgment be extended from the current deadline of July 17, 2024, by 60 days to September 16,  
22 2024; that oppositions to any motion for summary judgment be due October 16, 2024; and that any  
23 replies be due November 6, 2024. This is the first request for an extension of time with respect to  
24 the dispositive motion deadline and the eighth request for an extension of the time as it relates to  
25 the scheduling order. There is good cause for extending the dispositive motion deadline as the  
26 parties only recently completed the deposition of a key witness, Scott Chassereau, on July 2<sup>nd</sup> which  
27 was taken after the close of discovery pursuant to stipulation of the parties. The parties are still  
28 waiting for the deposition transcript. Mr. Chassereau will have 30 days to review the transcript once

received and counsel for the parties will need time to review the transcript and evaluate the impact of the testimony on the record for summary judgment. Furthermore, counsel for the parties met and conferred telephonically about the proposed briefing schedule and agree that additional time is required as counsel for both parties have considerable scheduling conflicts in the month of August that the parties agree necessitate the briefing schedule be extended. The parties accordingly agree to the following briefing schedule for dispositive motions:

- Dispositive Motion Deadline - **September 16, 2024**
- Oppositions to Dispositive Motions - **October 16, 2024**
- Replies in Support of Dispositive Motions - **November 6, 2024**
- Joint Pre-Trial Order - **30 days after resolution of dispositive motions**

The Parties make this stipulation in good faith and not for the purposes of delay.

Dated: July 9, 2024

*/s/ James P. Kemp, Esq.*

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T-MOBILE USA, INC.

**IT IS SO ORDERED.**

Dated: 7/10/2024



UNITED STATES MAGISTRATE JUDGE

4890-2349-4607.1 / 066431-1120